

DARRIN L. WILLIAMS  
RANDALL K. PULLIAM  
**CARNEY WILLIAMS BATES BOZEMAN  
& PULLIAM, PLLC**  
11311 Arcade Drive, Suite 200  
Little Rock, Arkansas 72212  
Telephone: (501) 312-8500  
Facsimile (501) 312-8505  
dwilliams@carneywilliams.com  
rpulliam@carneywilliams.com

JAMES M. WAGSTAFFE (95535)  
ADRIAN J. SAWYER (203712)  
JACQUELINE S. CORLEY (173752)  
**KERR & WAGSTAFFE, LLP**  
100 Spear Street, Suite 1800  
San Francisco, CA 94105-1528  
Telephone: (415) 371-8500  
Facsimile: (415) 371-0500  
wagstaffe@kerrwagstaffe.com  
sawyer@kerrwagstaffe.com

Attorneys for Proposed Lead Plaintiff  
The Firefighters' Pension System of the  
City of Kansas City, Missouri Trust

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

GUOHUA ZHU, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,  
and EBRAHIM SHABUDIN,

Defendants.

Case No. CV 09-04208-JSW

**THE FIREFIGHTERS' PENSION  
SYSTEM OF THE CITY OF KANSAS  
CITY, MISSOURI TRUST'S  
MEMORANDUM OF LAW IN  
FURTHER SUPPORT OF ITS MOTION  
FOR APPOINTMENT AS LEAD  
PLAINTIFF, APPROVAL OF ITS  
SELECTION OF COUNSEL, AND  
CONSOLIDATION OF RELATED  
CASES**

DATE: December 18, 2009  
TIME: 9:00  
COURTROOM: 11

HUY TRAN, Individually and On Behalf of All  
Others Similarly Situated,  
Plaintiff,

vs.  
UCBH HOLDINGS, INC., THOMAS S. WU,  
and CRAIG ON,  
Defendants.

Case No. CV 09-04429-JSW  
(Related Case)

SALVADOR PEREZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.  
UCBH HOLDINGS, INC., THOMAS S. WU,  
EBRAHIM SHABUDIN, CRAIG S. ON,  
MERRILL LYNCH, PIERCE, FENNER &  
SMITH, INCORPORATED, BANK OF  
AMERICA CORPORATION and SANDLER  
O'NEILL + PARTNERS, L.P.,

Defendants.

Case No. CV 09-04492-JSW  
(Related Case)

DOMINIQUE DURBIN, individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.  
UCBH HOLDINGS, INC., THOMAS S. WU,  
and CRAIG ON,

Defendants.

Case No. CV 09-04513-JSW  
(Related Case)

WATERFORD TOWNSHIP GENERAL  
EMPLOYEES RETIREMENT SYSTEM,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.  
UCBH HOLDINGS, INC., THOMAS S. WU,  
CRAIG S. ON, and EBRAHIM SHABUDIN,

Defendants.

Case No. CV 09-0449-MHP

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DANIEL NYGAARD, WENDY FONG,  
JAMES ELAM, On Behalf of Themselves and  
All Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,  
CRAIG S. ON, and EBRAHIM SHABUDIN,

Defendants.

Case No. CV 09-04505-VRM

1 The Firefighters' Pension System of the City of Kansas City, Missouri ("Kansas City  
 2 Firefighters' Pension System") respectfully submits this memorandum of law in further support  
 3 of its Motion for Appointment as Lead Plaintiff, Approval of Its Selection of Counsel, and  
 4 Consolidation of Related Cases. Based upon a review of the submissions by other lead plaintiff  
 5 applicants, it appears that the Kansas City Firefighters' Pension System does not have the largest  
 6 financial interest in the relief sought in this case. Kansas City Firefighters' Pension System,  
 7 however, remains ready, willing and able to serve as Lead Plaintiff should it be determined that  
 8 for any reason, the movants with larger losses than the Kansas City Firefighters' Pension System  
 9 are inadequate, atypical or procedurally barred from leading this litigation on behalf of the  
 10 putative Class.

11 DATED: November 25, 2009

**KERR & WAGSTAFFE LLP**

12  
 13 By s/  
 JACQUELINE S. CORLEY

14 Attorneys for Proposed Lead Plaintiff  
 15 The Firefighters' Pension System of the  
 16 City of Kansas City, Missouri Trust

17 **Proposed Liaison Counsel and Proposed Lead**  
**Counsel**

18 **CARNEY WILLIAMS BATES BOZEMAN &**  
 19 **PULLIAM, PLLC**  
 20 Darrin L. Williams  
 Randall K. Pulliam

**PROOF OF SERVICE**

I, Andrew Hanna, declare that I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kerr & Wagstaffe LLP, 100 Spear Street, Suite 1800, San Francisco, California 94105.

On, November 25, 2009 I served the following document(s):

**THE FIREFIGHTERS' PENSION SYSTEM OF THE CITY OF KANSAS CITY,  
MISSOURI TRUST'S MEMORANDUM OF LAW IN FURTHER SUPPORT OF  
ITS MOTION FOR APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF  
ITS SELECTION OF COUNSEL, AND CONSOLIDATION OF RELATED  
CASES**

on the parties listed below as follows:

**SEE ATTACHED SERVICE LIST**

- ☒ **By first class mail** by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid and placing the envelope in the firm's daily mail processing center for mailing in the United States mail at San Francisco, California.
- ☐ **By facsimile machine (FAX)** by personally transmitting a true copy thereof via an electronic facsimile machine.
- ☐ **By personal service** by causing to be personally delivered a true copy thereof to the address(es) listed herein at the location listed herein.
- ☐ **By Federal Express** or overnight courier.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 25, 2009, at San Francisco, California.

s/  
Andrew Hanna